

Exhibit 2

Scott Medlock

From: Coogan, Kim <kim.coogan@texasattorneygeneral.gov>
Sent: Tuesday, July 23, 2013 4:20 PM
To: Jeff Edwards
Cc: Garcia, Bruce; Mase, Lacey; Scott Medlock
Subject: RE: McCollum depos

Hi Jeff,

I just finished a meeting with my clients. They will not agree to present any witnesses for deposition until the 12b6 has been ruled on.

Kim

From: Jeff Edwards [<mailto:jeff@edwards-law.com>]
Sent: Tuesday, July 23, 2013 2:30 PM
To: Coogan, Kim
Cc: Garcia, Bruce; Mase, Lacey; Scott Medlock
Subject: Re: McCollum depos

No, we will need to do much sooner. We can do on separate days. Is either available on the 31st.

Please give me several dates for them as soon as you can.

On Jul 23, 2013, at 2:23 PM, "Coogan, Kim" <kim.coogan@texasattorneygeneral.gov> wrote:

I'm so sorry, now they are no longer available. My bad.

Like you, I am still hoping for Galveston.

This may be too far away, but our Rule 26 conference is in Galveston 9/18 in Adams and Webb.

Could we do them the day before or after?

From: Jeff Edwards [<mailto:jeff@edwards-law.com>]
Sent: Tuesday, July 23, 2013 12:12 PM
To: Garcia, Bruce; Coogan, Kim
Cc: Mase, Lacey; Scott Medlock
Subject: Re: McCollum depos

Let's do it. Scott or I will handle them.

on 7/23/13 11:02 AM, Garcia, Bruce at Bruce.Garcia@texasattorneygeneral.gov wrote:

I am available on the 31st.

From: Coogan, Kim
Sent: Monday, July 22, 2013 2:14 PM
To: Jeff Edwards; Garcia, Bruce
Cc: Mase, Lacey
Subject: McCollum depos

Jeff and Bruce

Owen Murray and Glenda Adams are both available July 31 in Huntsville. I can't guarantee they would also be able to overflow onto the 1st if we did not finish . Do you want the 31st in Huntsville or want 2 back to back days later? They both reside in Huntsville and principle offices for each is there.

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Scott Medlock

From: Coogan, Kim <kim.coogan@texasattorneygeneral.gov>
Sent: Tuesday, June 25, 2013 12:17 PM
To: Jeff Edwards; Scott Medlock
Cc: Mase, Lacey; Garcia, Bruce
Subject: RE: depositions

Yes I am talking about the 30b6 witness. She will be available in August.
I will work on dates for the others as well. You said Charles Owens, did you mean Owen Murray?
I really had not planned on filing a motion to extend expert des. deadlines, but I can file one if that helps. How much time does everybody want? Maybe I can get 6 months?

From: Jeff Edwards [<mailto:jeff@edwards-law.com>]
Sent: Tuesday, June 25, 2013 12:08 PM
To: Coogan, Kim; Scott Medlock
Cc: Mase, Lacey; Garcia, Bruce
Subject: Re: depositions

Kim,

We will work with you. My only concern is that we have an expert designation on august 5.

I assume by expert you mean person you would be putting up on the 30b6 categories. That can work if you can get us the medical chart for the inmates who died and Bruce can get us the file for the inmates who died in July. Can you also get me an organizational chart from medical director of prison to regional director on up in July if it differs substantially from what is on your website.?

If your 30b6 witness is not available, what about Dr. Charles Owens or Dr. Danny Adams. We would like to depose them as well and don't mind beginning with them as opposed to the 30b6. Please get me dates for these two gentleman. We may want to depose Donna Sollenberger as well given that she is responsible for providing operational and financial oversight for the CMC program that provides care to three fourths of the state's incarcerated.

I look forward to hearing from you,

Jeff

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on 6/25/13 11:17 AM, Coogan, Kim at kim.coogan@texasattorneygeneral.gov wrote:

Hi guys,

My expert on UTMB medical procedures, etc. at the units is not available until August, but is pretty much available any time in August as long as she is deposed in Huntsville. Is that possible for y'all?

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